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Attorneys for Defendants State of California, by and
8 *through California Highway Patrol, Blackwood,*
9 *Kee, and Rubalcava*

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 RIVERSIDE DIVISION
13

14 **L.C., et al.,**
15
16 Plaintiffs,
17
18 **STATE OF CALIFORNIA, et al.,**
19 Defendants.
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No. 5:22-cv-00949 KK-SHKx

**STATE DEFENDANTS' NOTICE
OF JOINDER AND JOINDER IN
COUNTY DEFENDANTS'
MOTIONS IN LIMINE NOS. 2, 4,
AND 6**

Date: May 15, 2025
Time: 9:30 a.m.
Courtroom: 3 (3rd Floor)
Judge: Hon. Kenly Kiya Kato
Trial Date: June 2, 2025
Action Filed: June 7, 2022

22 TO THE COURT AND ALL PARTIES AND COUNSEL OF RECORD:
23 PLEASE TAKE NOTICE that Defendants State of California, by and through
24 California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo
25 Rubalcava (State Defendants) join in Defendants County of San Bernardino, Jake
26 Adams, and Robert Vaccari's (County Defendants) motions in limine Nos. 2, 4, and
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1 6, filed on April 15, 2025, and set for hearing on May 15, 2025, at 9:30 a.m., in
2 Courtroom 3, before the Honorable Kenly Kiya Kato. (ECF Nos. 126, 129, 130.)

3 This joinder is based on this notice of joinder, the County Defendants' notices
4 of motions and motions in limine Nos. 2, 4, and 6¹ with all supporting documents
5 and memorandum, the Court's file in this matter, matters of which the Court may
6 take judicial notice, and any other matter that may properly come before the Court.
7 Based on this joinder, the State Defendants respectfully move this Court for orders:
8 (a) limiting or excluding the testimony of Plaintiffs' police-practices expert Roger
9 Clark; (b) excluding the black-and-white video footage taken by "neighbor Sal";
10 and (c) excluding lay witness testimony of decedent Hector Puga's state of mind.

11 This Joinder is made following a conference of counsel pursuant to the Court's
12 Standing Order in Civil Actions and Local Rule 7-16, which took place on April 7
13 and 11, 2025.

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15 Dated: April 17, 2025

Respectfully submitted,

16 ROB BONTA
17 Attorney General of California
18 NORMAN D. MORRISON
Supervising Deputy Attorney General

19 */s/ Diana Esquivel*

20 DIANA ESQUIVEL
21 Deputy Attorney General
22 *Attorneys for Defendants State,*
23 *Blackwood, Kee, and Rubalcava*

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¹ This joinder includes the State Defendants' joinder in the County Defendants' ex parte application to be permitted to file an additional motion in limine. (See ECF No. 127.)